

1 **FABIAN VAN COTT**
2 TREVOR R. WAITE
3 411 E. Bonneville Ave., Suite 400
4 Las Vegas, NV 89101
5 Office: (702) 233-4444
6 Fax: (877) 898-1168
7 www.fabianvancott.com

8 **HARRIS SARRATT & HODGES, LLP**
9 H. Clay Hodges, NCSB # 29270 (*pro hac vice* admission)
10 3948 Browning Place, Suite 334
11 Raleigh, North Carolina 27609
12 Tel.: 919.546.8788
13 Fax: 919.546.8789
14 chodges@hshllp.com
15 *Attorneys for Plaintiff PNHC, LLC*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 PNHC, LLC,

19 CASE NO.: 2:21-cv-00906-JCM-EJY

20 Plaintiff,

21 v.
22 GANJA, LLC, d/b/a HYDRO Las Vegas, a
23 Nevada limited liability company; MITCHELL
24 HOSTMEYER, an individual; JAMES
25 GREENWOOD, an individual; MARCIA
HAGER, an individual; SOCIAL WEALTH,
LLC, a Nevada limited liability company dba
CILI BY DESIGN; DOES INDIVIDUALS 1-
10; ROE CORPORATIONS 1-10,

26 **JOINT MOTION TO STAY
27 PROCEEDINGS PENDING
RESOLUTION OF RELATED
LITIGATION**

28 Defendants.

29
30 PNHC, LLC, (“Plaintiff”) and Ganja, LLC d/b/a HYDRO Las Vegas, Mitchell
31 Hostmeyer, and James Greenwood (“Ganja Defendants”), by and through undersigned
32 counsel, hereby jointly move the Court for an order to stay proceedings in the underlying
33

1 action while subject-matter related but separate litigation is resolved in Nevada state court.

2 Plaintiff and Ganja Defendants respectfully show the Court:

3 1. Plaintiff's Complaint in this case was filed May 7, 2021.

4 2. Ganja Defendants timely filed their answer to the Complaint on December
5 8, 2021.

6 3. On or around March 21, 2022, Ganja Defendants provided answers and
7 responses to Plaintiff's *First Set of Interrogatories and Requests for Production of*
8 *Documents*. Ganja Defendants also submitted their *First Supplement to Early Case*
9 *Conference List of Witnesses and Documents*. In these submissions Plaintiff discovered that
10 Ganja Defendants accepted Plaintiff's wire transfer deposit of \$362,500.00 on March 25,
11 2020, and on the same day wired \$350,000.00 to SBL, LLC, d/b/a Global Cannabinoids
12 (hereinafter "Global"), a Nevada company and third-party manufacturer, who had entered
13 into a separate agreement with Ganja Defendants to manufacture the 4,000,000 bottles of
14 hand sanitizer Plaintiff had ordered from Defendant Ganja.
15

16 4. Global accepted the \$350,000.00 from Ganja Defendants but did not
17 manufacture or deliver any bottles of hand sanitizer.
18

19 5. Defendant Ganja has claims against Global for breach of contract and other
20 causes of action, related to their separate contract and to the transfer of funds.
21

22 6. On February 10, 2022, Defendant Ganja filed its *Amended Complaint* in
23 Nevada state court against Global and other potentially related companies, seeking damages
24 for breach of contract and other causes of action (hereinafter "Related Litigation"). Please
25 see *GANJA, LLC DBA HYDRO LAS VEGAS, a Nevada Limited Liability Company v. SBL,*
26 *LLC dba GLOBAL CANNABINOIDS, a Nevada Limited Liability Company; GLOBAL*
27

1 SANITIZER TECHNOLOGIES, LLC, a Nevada Limited Liability Company; DOES 1-10,
2 inclusive; and ROE CORPORATIONS 1-10, inclusive; Case No.: A-22-847810-C, Eighth
3 Judicial District Court, Clark County, Nevada, attached to this Motion as Exhibit A.

4 7. Included in these claims is a demand for the return of \$350,000.00, the
5 amount Defendant Ganja wired to Global following Defendant Ganja's receipt of
6 \$362,500.00 from Plaintiff in the present action. Defendant Ganja references Plaintiff
7 throughout this separate Nevada state court action.

9 8. Plaintiff and Ganja Defendants now agree that if Global properly responds
10 to the Related Litigation and returns the \$350,000.00 it received from Defendant Ganja, that
11 Defendant Ganja will be in a position to return Plaintiff's wire transfer deposit and that the
12 instant case may not need to be further litigated.

13 9. Because of this Related Litigation, Plaintiff and Ganja Defendants believe it
14 would be beneficial and most efficient to all active parties in the present litigation for this
15 Court to grant a stay of proceedings in the instant action while the Related Litigation
16 between Defendant Ganja and Global is litigated and resolved in Nevada state court.
17

18 10. Once the Related Litigation between Defendant Ganja and Global is either
19 successfully resolved or terminated, Plaintiff agrees to dismiss the instant action or request
20 that this Court lift the stay of proceedings in the instant action and resume litigation of the
21 instant case.

22 11. For these reasons, Plaintiff and Ganja Defendants respectfully request that
23
24 this Court grant a stay of proceedings in this action.

1 12. This motion is not interposed for the purposes of delay, but instead is jointly
2 requested in good faith to give the parties the time and resources to pursue resolution of the
3 related claims in the Related Litigation.

4 **WHEREFORE**, Plaintiff and Ganja Defendants respectfully and jointly request
5 that this Court grant their joint motion to stay proceedings during the pendency of the
6 Related Litigation, as more fully discussed herein.
7

8 This the 7th day of July, 2022.
9

10 **ALDRICH LAW FIRM, LTD.**

11 /s/ John P. Aldrich

12 John P. Aldrich, Esq.
13 Nevada Bar No. 6877
14 Catherine Hernandez, Esq.
15 Nevada Bar No. 8410
16 7866 West Sahara Avenue
17 Las Vegas, NV 89117
18 Telephone: (702) 853-5490
19 jaldrich@johnaldrichlawfirm.com
20 chernandez@johnaldrichlawfirm.com
21 *Attorneys for Ganja Defendants*

22 **FABIAN VAN COTT**

23 By: /s/ Trevor R. Waite

24 TREVOR R. WAITE
25 411 E. Bonneville Ave., Suite 400
26 Las Vegas, NV 89101
27 Office: (702) 233-4444
28 Fax: (877) 898-1168
29 www.fabianvancott.com

30 **HARRIS SARRATT & HODGES, LLP**

31 By: /s/ H. Clay Hodges

32 H. Clay Hodges, NCSB # 29270 (*pro hac vice* admission)
33 3948 Browning Place, Suite 334
34 Raleigh, North Carolina 27609
35 Tel.: 919.546.8788
36 Fax: 919.546.8789
37 chodges@hshllp.com

38 *Attorneys for Plaintiff PNHC, LLC*

CERTIFICATE OF SERVICE

This is to certify that on this date the foregoing **JOINT MOTION TO STAY PROCEEDINGS PENDING RESOLUTION OF RELATED LITIGATION** was electronically filed with the Clerk of Court using the CM/ECF System, which will send notification to all attorneys of record in this matter.

This the 7th day of July, 2022.

FABIAN VAN COTT

By: /s/ Trevor R. Waite
TREVOR R. WAITE
411 E. Bonneville Ave., Suite 400
Las Vegas, NV 89101
Office: (702) 233-4444
Attorney for Plaintiff PNHC, LLC

1 **FABIAN VAN COTT**
2 TREVOR R. WAITE
3 411 E. Bonneville Ave., Suite 400
4 Las Vegas, NV 89101
5 Office: (702) 233-4444
6 Fax: (877) 898-1168
7 www.fabianvancott.com

8 **HARRIS SARRATT & HODGES, LLP**
9 H. Clay Hodges, NCSB # 29270 (*pro hac vice* admission)
10 3948 Browning Place, Suite 334
11 Raleigh, North Carolina 27609
12 Tel.: 919.546.8788
13 Fax: 919.546.8789
14 chodges@hshlp.com
15 *Attorneys for Plaintiff PNHC, LLC*

16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 PNHC, LLC, CASE NO.: 2:21-cv-00906-JCM-EJY
19 Plaintiff,
20 v.
21 GANJA, LLC, d/b/a HYDRO Las Vegas, a ORDER
22 Nevada limited liability company; GRANTING JOINT MOTION
23 MITCHELL HOSTMEYER, an individual; TO STAY PROCEEDINGS
24 JAMES GREENWOOD, an individual; PENDING RESOLUTION OF
25 MARCIA HAGER, an individual; SOCIAL RELATED LITIGATION
26 WEALTH, LLC, a Nevada limited liability
27 company dba CILI BY DESIGN; DOES
INDIVIDUALS 1-10; ROE
CORPORATIONS 1-10,
Defendants.

28 The Joint Motion to Stay Proceedings Pending Resolution of Related Litigation
29 (“Motion”) having come before this Court, and for good cause appearing therefore, this
30

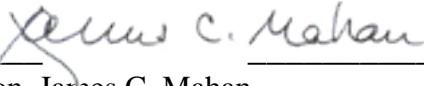
1 Court ORDERS as follows:
2

- 3 1. The Motion is GRANTED, in its entirety;
- 4 2. Case 2:21-cv-00906-JCM-EJY shall be stayed during the pendency of *GANJA, LLC*
5 *DBA HYDRO LAS VEGAS v. SBL, LLC dba GLOBAL CANNABINOIDS, et. al.*, in
6 the Eighth Judicial District Court, Clark County, Nevada, under case number A-22-
7 847810-C.

8 **IT IS SO ORDERED.**

9 Dated: July 11, 2022

10 IT IS FURTHER ORDERED that
11 the parties shall notify this Court
12 upon resolution of the State case.


13 _____
14 Hon. James C. Mahan
15 Judge, United States District Court
16
17
18
19
20
21
22
23
24
25
26
27